

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION**

No. 1:21-MD-3010 (PKC)

This Motion Relates To:

**AIM Media Ind. Operating, LLC v. Google,
LLC, No. 1:21-cv-06912-PKC (S.D.N.Y.)**

**AIM Media Midwest Operating, LLC v.
Google, LLC, No. 1:21-cv-06884-PKC
(S.D.N.Y.)**

**AIM Media Tex. Operating, LLC v. Google,
LLC, No. 1:21-cv-06888-PKC (S.D.N.Y.)**

**Appen Media Group, Inc. v. Google LLC, No.
1:22-cv-09810-PKC (S.D.N.Y.)**

**Brown Cnty. Publ'g Co., Inc. v. Google, LLC,
No. 1:21-cv-06915-PKC (S.D.N.Y.)**

**Capital Region Indep. Media LLC v. Google
LLC, No. 1:22-cv-06997-PKC (S.D.N.Y.)**

**Clarksburg Publ'g Co., d/b/a WV News v.
Google, LLC, No. 1:21-cv-06840-PKC
(S.D.N.Y.)**

**Coastal Point LLC v. Google, LLC, No. 1:21-
cv-06824-PKC (S.D.N.Y.)**

**Eagle Printing Co. v. Google, LLC, No. 1:21-
cv-06881-PKC (S.D.N.Y.)**

**ECENT Corp. v. Google, LLC, No. 1:21-cv-
06817-PKC (S.D.N.Y.)**

[Caption continued on following page]

Emmerich Newspapers, Inc. v. Google, LLC, No. 1:21-cv-06794-PKC (S.D.N.Y.)

Flag Publ'ns, Inc. v. Google, LLC, No. 1:21-cv-06871-PKC (S.D.N.Y.)

Gale Force Media, LLC v. Google, LLC, No. 1:21-cv-06909-PKC (S.D.N.Y.)

Gould Enters., Inc. v. Google, LLC, No. 1:22-cv-01705-PKC (S.D.N.Y.)

HD Media Co., LLC v. Google, LLC, No. 1:21-cv-06796-PKC (S.D.N.Y.)

Journal Inc. v. Google, LLC, No. 1:21-cv-06828-PKC (S.D.N.Y.)

Neighborhood Newspapers, Inc. v. Google LLC, No. 1:21-cv-10188-PKC (S.D.N.Y.)

Robinson Commc'ns, Inc. v. Google, LLC, No. 1:21-cv-08032-PKC (S.D.N.Y.)

Rome News Media, LLC v. Google LLC, No. 1:21-cv-10186-PKC (S.D.N.Y.)

Savannah Publ'g Co. v. Google, LLC, No. 1:22-cv-01693-PKC (S.D.N.Y.)

Something Extra Publ'g, Inc. v. Google, LLC, No. 1:21-cv-09523-PKC (S.D.N.Y.)

Southern Cmty. Newspapers, Inc. v. Google, LLC, No. 1:22-cv-01971-PKC (S.D.N.Y.)

Times Journal, Inc. v. Google LLC, No. 1:21-cv-10187-PKC (S.D.N.Y.)

Union City Daily Messenger, Inc. v. Google, LLC, No. 1:22-cv-01704-PKC (S.D.N.Y.)

[Caption continued on following page]

**Weakley Cnty. Press, Inc. v. Google, LLC,
No. 1:22-cv-01701-PKC (S.D.N.Y.)**

Plaintiffs,

-against-

GOOGLE LLC,

Defendant.

**DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO DISMISS
NEWSPAPER PLAINTIFFS' AMENDED COMPLAINT**

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Counsel for Defendant Google LLC

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Google LLC's Motion to Dismiss Newspaper Plaintiffs' Amended Complaint in the above-captioned matter, which is being submitted contemporaneously with this Notice of Motion, Defendant Google LLC will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, at a date and time to be set by the Court, for an Order dismissing with prejudice Counts I, II, IV and V of Newspaper Plaintiffs' Amended Complaint, No. 1:21-MD-3010 (PKC), ECF No. 401, on the ground that Newspaper Plaintiffs have failed to state a claim upon which relief can be granted. *See* Fed. R. Civ. P. 12(b)(6); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009); *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Dated: February 3, 2023

Respectfully Submitted,

/s/ Justina K. Sessions

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